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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

First Named Applicant: Agrawal	)	Art Unit: 2172
Serial No.: 09/487,191	)	Examiner: Fleurantin
Filed: January 19, 2000	)	AM9-99-0226
For: <b>SYSTEM AND ARCHITECTURE FOR PRIVACY- PRESERVING DATA MINING</b>	)	November 13, 2002
	)	750 B STREET, Suite 3120
	)	San Diego, CA 92101

REPLY BRIEF

Commissioner of Patents and Trademarks  
Washington, DC 20231

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Dear Sir:

This replies to the Answer dated November 6, 2002.

The Reply does not adequately explain why perturbing a single value K times to obtain K starting points for data cluster centroids (Fayyad et al., col. 2, lines 32-36), the closest Fayyad et al. evidently gets to "perturbing" anything, is the same thing as the claimed "perturbing original data..and using a distribution of the perturbed data to generate a distribution of the original data". No *distribution* of perturbed data is ever mentioned or suggested in Fayyad et al., the hand waving on page 4 of the Answer notwithstanding. In Fayyad et al., perturbations are used solely for obtaining cluster centroid starting points; that is all. Perhaps this explains why the Answer is reduced to trying to bootstrap admitted "implications" in Fayyad et al. to actual "disclosures" on the bottom of page 9.

The Answer attempts to motivate the consideration of privacy in Fayyad et al. using Tendick et al., but Tendick et al. nowhere addresses privacy in the context of the present claims, e.g., in generating data


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mining models as recited in Claim 1. All Tendick et al. is concerned with is maintaining privacy when databases are queried for such things as data means and ranges, not with model building. The question remains, just where is the motivation to combine Fayyad et al. and Tendick et al., then modify the combination away from what would actually result to arrive at the present claims?

The best the Answer can do in responding to this question is to castigate Appellant for "attacking references individually", but how else can Appellant address relied-upon teachings from specific references? The Answer further contains boilerplate about how "hindsight reconstruction" is always necessitated during examination. Without acquiescing in this dubious legal proposition, Appellant believes that this contention begs the question, "But this much hindsight reconstruction?" How the present rejections comport with In re Dembiczak (discussed in the Appeal Brief) and its many progeny remains a mystery.

Respectfully submitted,

  
\_\_\_\_\_  
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JLR:jg

**ASSISTANT COMMISSIONER FOR PATENTS  
WASHINGTON, DC 20231**

**Docket No. AM9-99-0226  
(PATENT)**

SIR:

Transmitted herewith for filing in the Application of: AGRAWAL Serial No.: 09/487,191

Title: SYSTEM AND ARCHITECTURE FOR PRIVACY-PRESERVING DATA MINING

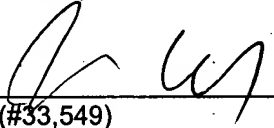
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Respectfully submitted,

  
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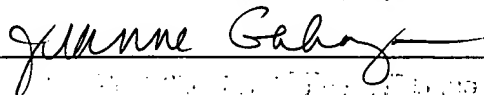
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